

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**DECLARATION OF DEBORAH STEIN IN
SUPPORT OF FACEBOOK, INC.'S
STATEMENT IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIALS
SHOULD BE SEALED**

I, Deborah Stein, hereby declare as follows:

1. I am a partner at the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for Facebook, Inc. (“Facebook”) in the above-captioned matter. I am a member in good standing of the State Bars of California and New York. I submit this declaration in support of Facebook, Inc.’s Statement In Support of Plaintiffs’ Administrative Motion to Consider Whether Another Party’s Material Should Be Filed Under Seal, related to Plaintiffs’ Opposition to Facebook, Inc.’s Administration Motion to Address New Requests for Production of Financial Documents. I make this declaration on my own knowledge, and I would testify to the matters stated herein under oath if called upon to do so.

2. A true and correct redacted version of Exhibit C to Plaintiffs’ Opposition to Facebook, Inc.’s Administration Motion to Address New Requests for Production of Financial Documents (“Exhibit C”), as filed at Dkt. 956-4, is attached hereto.

3. Facebook proposes to seal limited portions of Exhibit C that contain confidential information regarding Facebook’s business programs, strategies, and decisions. This information includes confidential strategic discussions regarding Facebook’s potential future business models and strategies. I am informed and believe that public disclosure of confidential information regarding Facebook’s business models could allow Facebook’s competitors to use this information developed at Facebook’s expense to improve or develop their own competing techniques, to Facebook’s competitive disadvantage. I am informed and believe that public disclosure of confidential information regarding Facebook’s business strategy could allow Facebook’s competitors to copy these proposed business strategies, developed at Facebooks expense, to more effectively compete with Facebook.

4. Facebook proposes to seal limited portions of Exhibit C that contain confidential technical details of how Facebook develops and uses data to target advertisements to the most relevant users. Facebook’s ability to serve advertisements to its users effectively is an essential aspect of its business. I am informed and believe that, if publicly disclosed, this information could

allow Facebook's competitors to improve their serve of advertisements to Facebook's competitive disadvantage.

5. Facebook proposes to seal limited portions of Exhibit C that convey confidential information regarding the identity of and negotiations with one entity with which I understand Facebook has a business relationship. I am informed and believe that, if publicly disclosed, this information could harm Facebook's relationship with this entity and undercut Facebook's ability to negotiate with competitors of this entity.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 12, 2022, in Los Angeles, California.

/s/ Deborah Stein

Deborah Stein